

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE PUDA COAL SECURITIES INC.  
ET AL. LITIGATION**

Case No: 1:11-CV-2598 (DLC)

CLASS ACTION

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**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY  
APPROVAL OF PROPOSED CLASS-ACTION SETTLEMENT WITH LAWRENCE S.  
WIZEL AND C. MARK TANG**

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Lead Plaintiffs Salomon Querub, Howard Pritchard, and Hotel Ventures LLC, and named plaintiffs Trellus Management Company LLC and Steven Weissmann (“Plaintiffs”) hereby move this Court for entry of an Order: (a) preliminarily approving the proposed settlement with Defendants Lawrence S. Wizel and C. Mark Tang (together, the “U.S. Directors”); (b) provisionally certifying a Settlement Class; (c) approving the form and method for giving notice to Class Members as provided in the Stipulation and Agreement of Settlement dated December 1, 2015 (the “U.S. Directors Stipulation”; and (d) scheduling a final approval hearing for a date at the Court’s convenience. Defendants do not oppose the relief requested by this motion.

This motion is based on this Notice of Motion, the U.S. Directors Stipulation, the supporting Memorandum of Points and Authorities, the [Proposed] Order submitted concurrently herewith, and all pleadings, records and papers on file herein.

Dated: December 1, 2015

Respectfully submitted,

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**PROOF OF SERVICE BY ELECTRONIC POSTING PURSUANT TO SOUTHERN  
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ON ALL KNOWN NON-REGISTERED PARTIES**

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On December 1, 2015, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 1st day of December, 2015, at Los Angeles, California.

*s/ Joshua L. Crowell*  
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## Mailing Information for a Case 1:11-cv-02598-DLC-HBP

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